

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JOSE MARIA DeCASTRO,
a/k/a CHILLE DeCASTRO,
a/k/a DELETE LAWZ,

Plaintiff,

v.

JOSHUA ABRAMS
a/k/a ACCOUNTABILITY FOR ALL,
KATE PETER
a/k/a MASSHOLE TROLL MAFIA,

Defendants.

Case No.

U.S. DISTRICT COURT
DISTRICT OF MASS.

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IN CLERKS OFFICE

COMPLAINT FOR DEFAMATION

The Plaintiff, Jose Maria DeCastro, hereby brings this complaint for defamation against the Defendants, Joshua Abrams and Kate Peter, and states as follows:

I. JURISDICTION AND VENUE

1. This court has original jurisdiction pursuant to 28 U.S. Code § 1332. The matter in controversy in this civil action exceeds the sum of \$75,000, and is between citizens of different states.
2. This court is the proper venue pursuant to 28 U.S. Code § 1391. This court is the only federal district court in the state of Massachusetts.

II. PARTIES

3. The Plaintiff is an individual and resides at 1258 Franklin Street, Santa Monica, CA 90404.

4. Defendant Joshua Abrams is an individual and resides at 21 Valley Road, Stoneham, MA 02180. Defendant Kate Peters is an individual and resides at 47 Avery Street, Apt. #1, North Attleboro, MA.

III. FACTS

5. The Plaintiff's Youtube channel is named "Delete Lawz."
6. Defendant Abrams's Youtube channel is named "Accountability for All."¹
7. Defendant Peters's Youtube channel is named "Masshole Troll Mafia."²
8. Both the Plaintiff and the Defendants earn their full-time income from their Youtube channels and websites.
9. From January 2022, the date that the Plaintiff created his Youtube channel, Delete Lawz, to May 22, 2022, the date that the Defendants' began defaming the Plaintiff, the Plaintiff's Youtube channel views, watch hours, subscriber growth, Youtube like to dislike ratio, Youtube revenue, and website revenue were growing between ten and twenty percent per month. The Plaintiff was, at all times material, on a meteoric rise to popularity.

May 22, 2022 Video

¹ Defendant Abrams's Youtube channel features videos of Defendant Abrams entering limited and non public forums - libraries, child and protective support service facilities, city halls, post offices - to film employees and visitors in purposeful violation of facility policies prohibiting filming. Defendant Abrams then refuses to leave the facilities when commanded, refuses to cease the filming, and publishes to his monetized Youtube channel the controversial employee and visitor reactions that his filming triggers on video. The Defendant publishes the contact information of the employees and visitors that he films for the Defendant's Youtube audience to overwhelm with threats of violence and sexual violence.

² Defendant Peters's Youtube channel usually features livestreams and videos of Defendant Peter truthfully providing previously unknown, but sensitive and revealing, information about 'First Amendment auditors' and 'Sovereign Citizens.' Defendant Peter uses her "troll mafia" (Youtube subscribers and viewers) to economically, psychologically, and emotionally debilitate her usually deserving targets. However, Defendant Peter 'went rogue' on the Plaintiff and exploited the power of her Youtube channel to defame the Plaintiff when all else failed Defendant Peter in resolving her personal disputes with the Plaintiff.

10. On May 22, 2022, Defendant Peters livestreamed a video to her Youtube channel. Defendant Peters livestreamed the video from her home address. The title of the video is “Chille DeCastro once sold the Date Rape Drug and Might be a Snitch, Will Sue us for Mocking him.” The link to the video is: <https://www.youtube.com/watch?v=85YEdqvbqX4>. Defendant Peters’s livestream video generated over 11,000 views, almost 300 comments, and over \$1,000 in revenue for Defendant Peters. In the video, Defendant Peters published the following defamatory statements about the Plaintiff:

10.1. “Did you know Chille was arrested for manufacturing and with the intent to sell the date rape drug?” (Video at 00:06:45).

10.2. “I’ve read some very interesting records that I’m not at liberty to share in public right now, but let’s just say I know the circumstances of several of the circumstances of the restraining orders taken out against Chille DeCastro. I know of one, no two, restraining orders that are lifetime against Chille DeCastro.” (Video at 00:22:40).

10.3. “I’m very dogged. Looking into his past, what appears to be a pyramid scheme, definitely these products.”³ (Video at 00:23:50).

June 10, 2022 Video

11. On June 10, 2022, Defendant Abrams livestreamed a video to his Youtube channel. Defendant Abrams livestreamed the video from his home address. The title of the video is “Delete Laws truth! Lackluster & James Freeman join.” The link to the video is: <https://www.youtube.com/watch?v=85YEdqvbqX4>. Defendant Abrams’s livestream video generated over 17,000 views, almost 700 comments, and over \$1,000 in revenue

³ The Plaintiff’s products are the “Happy Hammock” and “Jock Sock.”

for Defendant Peters. In the video, Defendant Abrams published the following defamatory statements about the Plaintiff:

- 11.1. “He sets up these businesses to get monetary assistance from investors and then to apply for lines of credit. But once it comes time to registering for the businesses, he lets it fall flat, and starts a new business, and kinda ponzi scheme pays back the previous investors.” (Video at 00:03:30).
- 11.2. “He has a criminal record, stalking, strangulation, multiple restraining orders.” (Video at 00:06:00).
- 11.3. “Here is a receipt for \$386 for nights in Danvers Massachusetts that I paid for Chili’s room for two nights stay.” (Video at 00:10:46).
- 11.4. “He has so many liens on him.” (Video at 00:05:12).
- 11.5. “I spoke to the woman at the front desk and she said this kind of thing could not happen and that Chille insisted to use the card.” (Video at 00:11:24).
- 11.6. “Buddy, you beat a woman. You threaten me with imprisonment. You stole from me and now you’re Ponzi scheming everyone.” (Video at 00:11:55).
- 11.7. “Now, when we went on recess, he immediately began texting me.” (Video at 00:13:40).
- 11.8. “I released a video of him beating up a chick.” (Video at 00:14:22).
- 11.9. “He has this long substantiated history of blackmailing people.” (Video at 00:16:16).
- 11.10. “He goes to New Hampshire and tells this guy that he needs his house and he kicks him out of his home. This guy is now at a hotel. He comes back at 6:15 in the morning and apparently he saw - finds - certain paraphernalia. And I will

leave it at that. And this guy had a total meltdown and kicked Chille straight out of his home.” (Video at 00:16:28).

11.11. “Chili found some investors in his app. So, I’m sitting in the car with Chille. He’s talking to his cousin about making this app and has this big investor who is going to invest in it. And his cousin is saying, like realistically that’s not gonna work, YouTube isn’t that simple. You’re making a really complex issue into something simple and it’s not. And then Chili’s said, oh we don’t need to create the app, we just need to make it look good for investors. So he speaks to this investor who says, I will toss you a large sum of money, which he wound up sending him, if you can actually produce this app and show me what it is. Later that night, he has an extension cord hooked up. And he’s showing you a skeleton version of Google Maps with little pillow poppers on it, purporting it to be an actual application that in no way shape or form actually exists. That’s what a con does.” (Video at 00:17:00).

12. On June 10, 2022, Defendant Peters appeared in Defendant Abrams’s livestream and published the following defamatory statements about the Plaintiff:

12.1. “Here is what I know, he tends to start a lot of these corporations, LLCs. He immediately lets them fall apart so they get administratively suspended. He’ll incorporate and then he’ll never file an annual filing. So the business falls apart. He’s using it as a front to get investor money, and then apply for lines of credit on products that never come to fruition. He’s using the money from the next product that’s never gonna happen to pay back the previous investors. Then talking to

multiple other people he also employs extortion, blackmail and threats.” (Video at 00:03:55).

13. From May 22, 2022, the date that Defendant Peter began defaming the Plaintiff, to August 2022, the Plaintiff’s average views per Youtube video on the Plaintiff’s channel declined from twenty-eight thousand to almost zero. The Plaintiff’s average watch hours per Youtube video on the Plaintiff’s channel declined from over four thousand to almost zero. The Plaintiff’s Youtube subscriber growth grinded to a halt. The Plaintiff’s average revenue per Youtube video on the Plaintiff’s channel declined from over \$120 per video to almost \$0.
14. From May 22, 2022, the date that Defendant Peter began defaming the Plaintiff, to August 2022, the Plaintiff’s average like to dislike ratio per Youtube video on the Plaintiff’s channel declined from over 95% likes per video to 60%.
15. From May 22, 2022, the date that Defendant Peter began defaming the Plaintiff, to August 2022, the Plaintiff’s website’s gross sales declined from \$4,000 per month to \$300.
16. The Defendants’ statements were complete and entire fabrications.
17. At all times material, the Defendants knew that the entirety of their statements were manufactured fabrications.
18. The Defendants’ statements caused the Plaintiff’s Youtube and website metrics to plunge.
19. The Defendants’ statements caused the Plaintiff mental and emotional anguish, and caused the Plaintiff to be harassed and stalked by the Defendants’ Youtube viewers.

IV. CLAIMS

Count One - Defamation - Joshua Abrams

20. On May 22, 2022, Defendant Abrams published to his third-party Youtube audience the following defamatory statements concerning the Plaintiff:

- 20.1. “He sets up these businesses to get monetary assistance from investors and then to apply for lines of credit. But once it comes time to registering for the businesses, he lets it fall flat, and starts a new business, and kinda ponzi scheme pays back the previous investors.” (Video at 00:03:30).
- 20.2. “He has a criminal record, stalking, strangulation, multiple restraining orders.” (Video at 00:06:00).
- 20.3. “Here is a receipt for \$386 for nights in Danvers Massachusetts that I paid for Chili’s room for two nights stay.” (Video at 00:10:46).
- 20.4. “He has so many liens on him.” (Video at 00:05:12).
- 20.5. “I spoke to the woman at the front desk and she said this kind of thing could not happen and that Chille insisted to use the card.” (Video at 00:11:24).
- 20.6. “Buddy, you beat a woman. You threaten me with imprisonment. You stole from me and now you’re Ponzi scheming everyone.” (Video at 00:11:55).
- 20.7. “Now, when we went on recess, he immediately began texting me.” (Video at 00:13:40).
- 20.8. “I released a video of him beating up a chick.” (Video at 00:14:22).
- 20.9. “He has this long substantiated history of blackmailing people.” (Video at 00:16:16).
- 20.10. “He goes to New Hampshire and tells this guy that he needs his house and he kicks him out of his home. This guy is now at a hotel. He comes back at 6:15 in the morning and apparently he saw - finds - certain paraphernalia. And I will

leave it at that. And this guy had a total meltdown and kicked Chille straight out of his home.” (Video at 00:16:28).

20.11. “Chili found some investors in his app. So, I’m sitting in the car with Chille. He’s talking to his cousin about making this app and has this big investor who is going to invest in it. And his cousin is saying, like realistically that’s not gonna work, YouTube isn’t that simple. You’re making a really complex issue into something simple and it’s not. And then Chili’s said, oh we don’t need to create the app, we just need to make it look good for investors. So he speaks to this investor who says, I will toss you a large sum of money, which he wound up sending him, if you can actually produce this app and show me what it is. Later that night, he has an extension cord hooked up. And he’s showing you a skeleton version of Google Maps with little pillow poppers on it, purporting it to be an actual application that in no way shape or form actually exists. That's what a con does.” (Video at 00:17:00).

21. The Defendant’s defamatory statements lowered the Plaintiff in the estimation of the Defendant’s Youtube audience and deterred the Defendant’s audience from dealing with the Plaintiff.
22. The Defendant published his defamatory statements negligently.
23. The Defendant published his defamatory statements maliciously.
24. The Defendant caused the Plaintiff to experience economic loss.
25. The Defendant’s statements accused the Plaintiff of committing crimes.
26. The Defendant’s statements prejudiced the Plaintiff’s profession or business.

Count Two - Defamation - Kate Peter

27. On May 22, 2022, Defendant Peters published to her third-party Youtube audience the following defamatory statements concerning the Plaintiff:
- 27.1. “Did you know Chille was arrested for manufacturing and with the intent to sell the date rape drug?”
- 27.2. “I’ve read some very interesting records that I’m not at liberty to share in public right now, but let’s just say I know the circumstances of several of the circumstances of the restraining orders taken out against Chille DeCastro. I know of one, no two, restraining orders that are lifetime against Chille DeCastro.”
- 27.3. “I’m very dogged. Looking into his past, what appears to be a pyramid scheme, definitely these products.”
28. The Defendant’s defamatory statements lowered the Plaintiff in the estimation of the Defendant’s Youtube audience and deterred the Defendant’s audience from dealing with the Plaintiff.
29. The Defendant published her defamatory statements negligently.
30. The Defendant published her defamatory statements maliciously.
31. The Defendant caused the Plaintiff to experience economic loss.
32. The Defendant’s statements accused the Plaintiff of committing crimes.
33. The Defendant’s statements prejudiced the Plaintiff’s profession or business.

**Counts Three (Joshua Abrams) and Four (Kate Peter) -
Intentional Infliction of Emotional Distress**

34. The Defendants intended their defamatory statements to inflict emotional distress upon the Plaintiff or knew or should have known that their defamatory statements would inflict such emotional distress upon the Plaintiff.

35. The Defendants' statements were extreme and outrageous, beyond all possible bounds of decency, and were utterly intolerable in a civilized community.
36. The Defendants' statements caused the Plaintiff distress.
37. The distress inflicted by the Defendants upon the Plaintiff was severe and of a nature that no reasonable man could be expected to endure it.

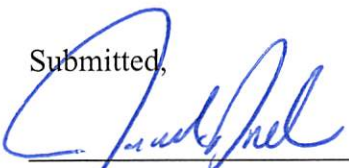
Counts Five (Joshua Abrams) and Six (Kate Peter) - Punitive Damages

38. The Defendants' statements were published maliciously and with reckless indifference to the Plaintiff's rights.

V. PRAYER FOR RELIEF

39. Monetary damages in the amount of \$250,000 per Defendant.
40. Compensatory damages in the amount of \$350,000 per claim, per Defendant.
41. Punitive damages in the amount of \$350,000 per claim, per Defendant.
42. Costs of litigation.
43. All other equitable relief.

Submitted,



Jose M. DeCastro, *Pro Se* 🍌
Plaintiff

1258 Franklin Street
Santa Monica, CA 90404
(310) 963-2445
chille@situationcreator.com

9/2/22
Date

GHOSTWRITING CERTIFICATE

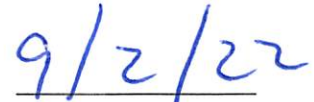
The Plaintiff hereby certifies that no attorney assisted the Plaintiff's drafting of this document.

Submitted,



Jose M. DeCastro, *Pro Se*
Plaintiff

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Santa Monica, CA 90404
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chille@situationcreator.com



Date